

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
	§	
v.	§	Case No. 3:09-CR-210-B
	§	
JESSE WILLIAM MCGRAW,	§	ECF
Defendant.	§	

**DEFENSE COUNSEL’S UNOPPOSED MOTION TO CONTINUE THE
DUE DATE FOR PRESENTENCE INVESTIGATION REPORT OBJECTIONS**

TO THE HONORABLE JUDGE JANE J. BOYLE:

Contemporaneously with this motion, undersigned counsel is filing a motion that requests that this Court grant undersigned counsel permission to withdraw from representing Mr. McGraw. The government does not oppose the motion to withdraw. Undersigned counsel believes that whether this Court will allow him from withdrawing from this case ought to be decided prior to the defense filing its response to the PSR. Accordingly, the defense respectfully requests that this Court postpone the deadline for objections to the PSR until after the resolution of undersigned counsel’s withdrawal motion.

Respectfully submitted,

/s/ John M. Nicholson

John M. Nicholson
Assistant Federal Public Defender
Northern District of Texas
Texas Bar # 24013240
525 Griffin Street, Suite 629
Dallas, Texas 75202
214.767.2746
214.767.2886 (facsimile)
john_nicholson@fd.org

Attorney for Jesse McGraw

CERTIFICATE OF CONFERENCE

I, John M. Nicholson, hereby certify that I conferred with Candy Heath, AUSA on the above-referenced motion, and learned that the government does not oppose the relief requested by this motion.

/s/ John M. Nicholson

John M. Nicholson

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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2010 I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this notice as service of this document by electronic means: Assistant U. S. Attorney Candy Heath at candina.heath@usdoj.gov. A copy of the foregoing document was also served by hand-delivery to Ms. Heath at 1100 Commerce St., Third Floor, Dallas, Texas.

/s/ John M. Nicholson

John M. Nicholson